

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
OPPOSITION TO DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO, LLC' MOTION FOR  
SUMMARY JUDGMENT, MOTION TO  
STRIKE TS 96, AND DAUBERT MOTION  
(DKT. 1514) AND EXHIBITS THERETO**

I, Felipe Corredor, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal Portions of Its Opposition to Defendants Uber Technologies, Inc. and Ottomotto, LLC’s Motion for Summary Judgment, Motion to Strike TS 96, and *Daubert* Motion (Dkt. 1514) (“Waymo’s Opposition”) and Exhibits Thereto, filed concurrently herewith (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Opposition	Highlighted Portions	Waymo (green highlighting); Defendants (blue highlighting)
Jaffe Declaration	Highlighted Portions	Defendants (blue highlighting)
Exhibit 1 to Jaffe Declaration	Entire Document	Defendants; Waymo
Exhibit 3 to Jaffe Declaration	Entire Document	Waymo; Defendants
Exhibits 4-6 to Jaffe Declaration	Entire Document	Defendants; Waymo (green highlighting)
Exhibit 8 to Jaffe Declaration	Highlighted Portions	Waymo (red highlighting)
Exhibit 12 to Jaffe Declaration	Entire Document	Defendants; Waymo
Exhibit 13 to Jaffe Declaration	Entire Document	Defendants; Waymo (green highlighting)
Exhibit 14 to Jaffe Declaration	Entire Document	Defendants
Exhibit 15 to Jaffe Declaration	Entire Document	Defendants; Waymo (green highlighting)

3. Specifically, the green or red highlighted portions of Waymo’s Opposition and Exhibits 4-6, 8, 13, and 15, as well as the entirety of Exhibits 1, 3, and 12 contain or refer to trade secret and/or confidential business information, which Waymo seeks to seal.

4. The green or red highlighted portions of Waymo’s Opposition and Exhibits 4-6, 8, 13, and 15, as well as the entirety of Exhibits 1, 3, and 12 contain, reference, and/or describe Waymo’s

1 trade secrets. The information Waymo seeks to seal includes the confidential design and functionality  
 2 of Waymo's proprietary autonomous vehicle system, including its LiDAR designs, which Waymo  
 3 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-  
 4 47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of  
 5 this information would give Waymo's competitors access to descriptions of the functionality or  
 6 features of Waymo's autonomous vehicle system. If such information were made public, I understand  
 7 that Waymo's competitive standing would be significantly harmed.

8 5. Waymo's request to seal is narrowly tailored to those portions of Waymo's Opposition  
 9 and Exhibits 1, 3-6, 8, 12-13, and 15 that merit sealing.

10 6. Waymo only seeks to seal the portions of Waymo's Opposition and the Jaffe  
 11 Declaration (highlighted blue) and the entirety of Exhibits 2, 4-6, and 13-15 identified in the table  
 12 above because Waymo believes such information is considered confidential or non-public by  
 13 Defendants.

14 I declare under penalty of perjury under the laws of the State of California and the United  
 15 States of America that the foregoing is true and correct, and that this declaration was executed in San  
 16 Francisco, California, on September 18, 2017.

17 By /s/ Felipe Corredor

18 Felipe Corredor  
 19 Attorneys for WAYMO LLC  
 20  
 21

22 **SIGNATURE ATTESTATION**

23 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
 24 filing of this document has been obtained from Felipe Corredor.

25 /s/ Charles K. Verhoeven

26 Charles K. Verhoeven  
 27  
 28